

14919 Pine View Drive
Grandview, MO 64030

T 816-708-9030

info@paperkidd.com
www.paperkidd.com



Marlene H. Dortch
FCC
445 12th Street, SW
Washington, D.C. 20554
7/21/2018

Re: ***Paperkidd Productions & Publishing, Jarrell D. Curne v. Verizon Wireless,***
Proceeding No. 18-140, Bureau ID No. EB-18-MD-003

Dear Ms. Dortch:

In reply to the July 18, 2018 answer to the Amended Formal Complaint in the above proceeding, attached you will find Paperkidd Productions & Publishing's Response for Opposition of Motion to Dismiss.

cc; Rosemary McEnery
Michael Engel
David L. Haga
Sandra Gray-Fields
Tamara Preiss

Regards,

Jarrell D. Curne

A handwritten signature in black ink, appearing to read "Jarrell Curne". The signature is fluid and cursive, with a long horizontal stroke at the end.

Before the
Federal Communications Commission
Washington, DC 20554

In the matter of)	
)	
Paperkidd Productions & Publishing,)	
Jarrell D. Curne)	
Complainants,)	Proceeding Number 18-140
)	File No. EB-18-MD-003
v.)	
)	
Verizon Wireless)	
Defendant)	

Response for Opposition of Motion to Dismiss

Jarrell D. Curne
Paperkidd, LLC.
14919 Pine View Drive
Grandview, Missouri, 64030

(816) 708-9030
DbFresh@Paperkidd.com

Complainants appear Pro Se

Dated: July 21, 2018

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Response for Opposition of Motion to Dismiss

Pursuant to 47 C.F.R. § 1.726 and the Bureau’s June 21, 2018 Notice, Paperkidd Productions & Publishing hereby submits this response for the Motion to Dismiss filed by defendants Verizon Wireless. For the reasons set forth below, but not limited to; the Motion to Dismiss should be denied.

The defendant’s preliminary statement is misleading. They fail to acknowledge the discrimination which has taken place. On March 23, 2018 and March 26, 2018 the defendant called the Olathe Police Department for a civil dispute that could have resulted in arrest, or death to a minority business owner, and low-income songwriter, Jarrell Curne. Bryan, whom last name is unknown, the store manager at the location of 15239 W 119Th St, Suite B2, Olathe, Kansas 66062 told Jarrell Curne on March 18, 2018 to bring the equipment back for a refund if there were anymore issues. When Paperkidd Productions & Publishing did as advised, 3 other employees named Ro, Josh, and Kyle last names unknown wrongfully called the authorities and banned Jarrell Curne from the store after 2 unsuccessful attempts to reach Bryan again. Verizon also falsely states no payments have been made on the account, but complainants did pay to begin service and paid with cash. This payment was made regardless if account had been opened 1 day, or 1 year and should count as proof the defendant Verizon Wireless wishes to mislead the Bureau. Furthermore on May 31, 2018 the Bureau was sent communication via email with the

defendant, stating a payment toward the account after Verizon Wireless again unlawfully suspended account while the Bureau was attempting to mediate. This payment was made to reactivate the service, but was later stopped after speaking with the defendants counsel.

Paperkidd Productions & Publishing has provided sufficient evidence to the defendant. The defendant states that no particular acts were spelled out, yet has failed to answer about why complainants were told to bring the device back but cops were instead called, even before this the defendants attempted to usher the complainants out the store on March 23, 2018 before any verbal altercation for no apparent reason while saying they didn't have a manager which is untrue. Calling the cops on a african-american after promising a refund is discrimination. Banning Jarrell Curne from the property, after taking cash for the transaction but disconnecting service is discrimination. Refusing to provide the contact information to management forcing Paperkidd Productions to contact the FCC as a mediator to receive a reply is discrimination. The defendants are a telecommunications company that provides broadband and clearly knows in today's climate that calling the police on the complainants endangered life, and freedom. By failing to even offer monetary compensation Verizon Wireless is basically implying Jarrell Curne, low income african-american's life isn't worth anything. The defendants appear to believe that this is about a billing dispute, but that is only part of this complaint.

Verizon Wireless chose to involve law enforcement in this matter instead of refunding Paperkidd Productions & Publishing. Jarrell Curne is the minority business owner, and being a 29 year old African-American male could have been killed, or arrested if he had not ran away. Verizon Wireless wishes to dismiss this case because they have no regard for African-American life. The defendant also has no grounds to dismiss the case because on top of the discrimination they have attempted to bill Paperkidd Production's for lines without fully providing access. For example they charged for 6 lines, then 5 lines, then 4 lines, but the watch and phone share a line and only 1 of the 2 iPads has service. Therefore Verizon Wireless is charging for 4 lines but only providing access to 3 which is unlawful. It should be noted that I have stated several times the iPad does not have service, but Verizon continuously bills the complainant regardless if the payment has been posted, and which is unlawful.

Verizon states Paperkidd has only been over billed hundreds of dollars, but until July 18, 2018 the last bill received was into the thousands. The defendant should be advised that Jarrell Curne, is the business owner. By banning Jarrell Curne, discrimination of the business took place which is unlawful. Verizon Wireless is attempting to phrase this as a billing dispute, again once authorities were called instead of refund being issued it went well beyond a bill and into discrimination. Furthermore, weather attempts were made to correct it or not the same problem still continues. The only party that seems to be confused is Verizon Wireless, again the defendants should note that they have went from 5 to 4 lines, but only 3 are active even though 4 are being billed which is unlawful. When corporations break the law, they should be held accountable. Verizon Wireless has continuously broken the law in regards to the provision of telecommunications service. The requested changes were made, but after they refused refund some equipment still does not work. The 512g iPad does not have service unless connected to wifi but is counted as 1 of 4 lines Verizon claims to have resolved. Just because they issue credits, without admitting liability does not mean they should not still be held accountable, especially taking into account 1 of the 4 lines do not work after charging for 6 to begin. Also the watch shares a line with the phone so technically only 2 of the 4 lines on the account are being used. Even with the watch having its own line and working, the iPad still does not.

Paperkidd Productions & Publishing does acknowledge attempted account adjustments, but they were not complete or correct. Verizon Wireless is attempting to dismiss a complaint without fully resolving the matter, which is further proof complainant should be granted requested relief. Verizon Wireless has made no reparation for the injuries suffered to Paperkidd Productions & Publishing, as the complainants were working on a \$100,000,000 record label advance like Young Money Cash Money got from Universal Records. Complainant was in the process of contacting Elliott Grainge, the UMG owner Lucian Grainge's son to facilitate a major label record deal. UMG (and Grainge), Vivendi's "Market Cap" is currently \$36.4 billion. The FCC TV airwaves being sold for wireless use worth \$86.4 billion and the Bureau will be sued for \$10 Billion dollars if it does not uphold the 1934 Communications Act due to discrimination against the defendant by granting requested relief based simply off the fact that Paperkidd is 100% minority owned business.

Jarrell Curne known as dB FRE\$H has featured presentations with Lil' Wayne of Young Money Cash Money, who also owned a percentage of Drake and Nicki Minaj's contracts. Jarrell Curne has signed acts whom he manages under the minority owned business Paperkidd Productions & Publishing, one of which has featured presentations with Nicki Minaj who are both on the \$100 Million Dollar Record Label. The complainants have stated in a letter to the Bureau that the defendants discrimination has resulted in a loss of income due to the record deal focus being shifted toward a legal dispute with Verizon Wireless. Jarrell Curne has been studying to represent himself pro se and has not have time to write a record in months due to energy, time and effort all going into these matters with the Bureau. Crediting a thousand months later, is not sufficient to make up losses of a multi million dollar music deal as Paperkidd Productions & Publishing is a entertainment agency.

The defendants keep stating the Bureau does not have the authority to award, and the complainants are not entitled. Franklin D. Roosevelt's 1934 Communication Act specifically states otherwise. Paperkidd Productions & Publishing maintains that under the Act it has stated loss of income and requested relief for discrimination, unlawful charges, fines paid to the USA, and pro se attorney fees. The Bureau should take into account the defendant's refusal to answer a valid complaint under the 1934 Act while charging for 4 lines, but only providing access to 3 after refusing a promised refund, and discriminating by calling the police. The defendant has failed to resolve all matters so if the Bureau grants the request for dismissal it would be based solely off the discrimination of not applying the rules evenly when a minority owned business is involved against a multinational conglomerate.

ANSWER

Verizon has made no reparations for the discrimination, and has continued to allege it resolved the matter without the iPad working while unlawfully charging. The defendant should stop telling the Bureau what it cant do, because under the 1934 Communications Act it can; and if it does not the Western Federal District Court Judge of Missouri will review why when determining if the Bureau also has discriminated while judging this matter. The Bureau has made clear a answer to the allegation that Verizon's answer is needed to judge all facts, yet Verizon

Wireless chooses to ignore such request in attempts to dismiss a valid complaint. For this relief should be granted to the complainants.

Paperkidd alleges that Verizon Wireless has not resolved the unlawful charges as the iPad does not have service so the 5 lines that are now 4 are still being over billed, and no reparations have been made for discrimination under the 1934 Act. Further action by the Bureau of Commission is necessary and warranted. Verizon is attempting to keep the complaint confidential because like Starbucks, CVS and other establishments this would be bad for business if it hits the media. Which is also why the defendant is attempting to object to providing requested evidence and documentation for Paperkidd Productions & Publishing. Verizon keeps stating it has resolved matters, but charges for iPad which is not active that it counts as the 4th line, after it was charging for 5, when originally charging for 6, again this is unlawful. They have failed to provide access while charging regardless.

The FCC should be advised that Verizon Wireless wants to stay confidential for the complainant but the complainant rather this case be presented in the public. Paperkidd Productions is a entertainment agency and like to be 100% transparent in all business matters regardless of the information relayed to the public. For this reason the Bureau should deny the confidentiality request, as the defendant has no right to use Paperkidd Productions & Publishing as an excuse to stop bad publicity. The defendants reparations are not right, and this is an attempted coverup from the public during a time at which corporations are being called out for discrimination against blacks by calling the authorities.

Pursuant to sections of the 1934 communications act Verizon Wireless violated the prohibition against unjust and unreasonable discrimination. The low income songwriter, Jarrell Curne, and minority owned business Paperkidd Productions & Publishing state specific harms inflicted, as Mr. Curne known as “dB FRE\$H” could've been killed in a situation uncalled for with the Olathe Police Department while having to “Runaway,” after the defendant continuously crammed charges unlawfully after disconnecting telecommunications service without merit and has continued to do such. Verizon Wireless failed to furnish reasonable communications service upon reasonable request without the intervention of the commission at a time the agency is low

on resources according to Tracy Bridgham. This should substantiate the relief requested by complainants.

The complainants have requested the commission move immediately to grant motion for evidence repeatedly. The defendant also denies a responsibility to compensate monetary damages after continuously violating the Act which shows a lack of respect for Presidential executive orders. Furthermore the 1934 Act that Verizon states the Bureau cant uphold has been quoted below for proof the Bureau does hold the power to do what is right for Paperkidd Productions & Publishing without bias because it is 100% minority owned.

SEC. 201. [47 U.S.C. 201] SERVICE AND CHARGES.

(b) All charges, practices, classifications, and regulations for and in connection with such communication service, shall be just and reasonable, and any such charge, practice, classification, or regulation that is unjust or unreasonable is hereby declared to be unlawful: Provided, That communications by wire or radio subject to this Act may be classified into day, night, repeated, unrepeated, letter, commercial, press, Government and such other classes as the Commission may decide to be just and reasonable, and different charges may be made for the different classes of communications: Provided further, That nothing in this Act or in any other provision of law shall be construed to prevent a common carrier subject to this Act from entering into or operating under any contract with any common carrier not subject to this Act, for the exchange of their services, if the Commission is of the opinion that such contract is not contrary to the public interest: Provided further, That nothing in this Act or in any other provision of law shall prevent a common carrier subject to this Act from furnishing reports of positions of ships at sea to newspapers of general circulation, either at a nominal charge or without charge, provided the name of such common carrier is displayed along with such ship position reports. The Commissioner may prescribe such rules and regulations as may be necessary in the public interest to carry out the provisions of this Act.

SEC. 202. [47 U.S.C. 202] DISCRIMINATION AND PREFERENCES.

(a) It shall be unlawful for any common carrier to make any unjust or unreasonable discrimination in charges, practices, classifications, regulations, facilities, or services for or in connection with like communication service, directly or indirectly, by any means or device, or to make or give any undue or

3 unreasonable preference or advantage to any particular person, class of persons, or locality, or to subject any particular person, class of persons, or locality to any undue or unreasonable prejudice or disadvantage.

(b) Charges or services, whenever referred to in this Act, include charges for, or services in connection with, the use of common carrier lines of communication, whether derived from wire or radio facilities, in chain broadcasting or incidental to radio communication of any kind.

(c) Any carrier who knowingly violates the provisions of this section shall forfeit to the United States the sum of \$6,000 for each such offense and \$300 for each and every day of the continuance of such offense.

SEC. 206. [47 U.S.C. 206] LIABILITY OF CARRIERS FOR DAMAGES.

In case any common carrier shall do, or cause or permit to be done, any act, matter, or thing in this Act prohibited or declared to be unlawful, or shall omit to do any act, matter, or thing in this Act required to be done, such common carrier shall be liable to the person or persons injured thereby for the full amount of damages sustained in consequence of any such violation of the provisions of this Act, together with a reasonable counsel or attorney's fee, to be fixed by the court in every case of recovery, which attorney's fee shall be taxed and collected as part of the costs in the case.

SEC. 207. [47 U.S.C. 207] RECOVERY OF DAMAGES.

Any person claiming to be damaged by any common carrier subject to the provisions of this Act may either make complaint to the Commission as hereinafter provided for, or may bring suit for the recovery of the damages for which such common carrier may be liable under the provisions of this Act, in any district court of the United States of competent jurisdiction; but such person shall not have the right to pursue both such remedies.

SEC. 209. [47 U.S.C. 209] ORDERS FOR PAYMENT OF MONEY.

If, after hearing on a complaint, the Commission shall determine that any party complainant is entitled to an award of damages under the provisions of this Act, the Commission shall make an order directing the carrier to pay to the complainant the sum to which he is entitled on or before a day named.

SEC. 215. [47 U.S.C. 215] TRANSACTIONS RELATING TO SERVICES, EQUIPMENT, AND SO FORTH.

(a) The Commission shall examine into transactions entered into by any common carrier which relate to the furnishing of equipment, supplies, research, services, finances, credit, or personnel to such carrier and/or which may affect the changes made or to be made and/or the services rendered or to be rendered by such carrier, in wire or radio communications subject to this Act, and shall report

4 to the Congress whether any such transactions have affected or are likely to affect adversely the ability of the carrier to render adequate service to the public, or may result in any undue or unreasonable increase in charges or in the maintenance of undue or unreasonable charges for such service; and in order to fully examine into such transactions the Commission shall have access to and the right of inspection and examination of all accounts, records, and memoranda including all documents, papers, and correspondence

now or hereafter existing, of persons furnishing such equipment, supplies, research, services, finances, credit, or personnel. The Commission shall include in its report its recommendations for necessary legislation in connection with such transactions, and shall report specifically whether in its opinion legislation should be enacted (1) authorizing the

Commission to declare any such transactions void or to permit such transactions to be carried out subject to such modification of their terms and conditions as the Commission shall deem desirable in the public interest; and/or (2) subjecting such transactions to the approval of the Commission where the person furnishing or seeking to furnish the equipment, supplies, research, service, finances, credit or personnel is a person directly or indirectly controlling or controlled by, or under direct or indirect common control with, such carrier; and/or (3) authorizing the Commission to require that all or any transactions of carriers involving the furnishing of equipment, supplies, research, services, finances, credit, or personnel to such carrier be upon competitive bids on such terms and conditions and subject to such regulations as it shall prescribe as necessary in the public interest.

(b) The Commission shall investigate the methods by which and the extent to which wire telephone companies are furnishing wire telegraph service and wire telegraph companies are furnishing wire telephone service, and shall report its findings to Congress together with its recommendations as to whether additional legislation on this subject is desirable.

(c) The Commission shall examine all contracts of common carriers subject to this Act which prevent the other party thereto from dealing with another common carrier subject to this Act, and shall report its findings to Congress, together with its recommendations as to whether additional legislation on this subject is desirable.

SEC. 217. [47 U.S.C. 217] LIABILITY OF CARRIER FOR ACTS AND OMISSIONS OF AGENTS.

In construing and enforcing the provisions of this Act, the act, omission, or failure of any officer, agent, or other person acting for or employed by any common carrier or user, acting within the scope of his employment, shall in every case be also deemed to be the act, omission, or failure of such carrier or user as well as that of the person.

If complainants are not granted relief requested pursuant to SEC. 207. [47 U.S.C. 207] RECOVERY OF DAMAGES the FCC will be sued for \$10 BILLION DOLLARS in the Western Federal District Court of Missouri for racial discrimination under The Civil Rights Act of 1964 that outlaws discrimination based on race, color, religion, sex, or national origin along with failure to uphold the 1934 communications act. Please reference *ENTERTAINMENT STUDIOS v. FCC, and CHARTER COMMUNICATIONS*.

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Proposed Order

After consideration of neglect to provide monetary reparations under Franklin D. Roosevelt's 1934 Communication Act, and failure to fully resolve all matters in the parties submissions regarding requested relief in the above-referenced proceeding,
IT IS HEREBY ORDERED that Complainants' Request for Relief in the amount of \$101,500,000 is **GRANTED** due to continuous unlawful charges in the provision of telecommunications service, and discrimination of a 100% minority owned business and owner.
IT IS HEREBY ALSO ORDERED that the Defendants' fully activate all lines of service.

Federal Communications Commission

Rosemary McEnery

Michael Engel